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 Attorneys for Defendant
 Lucent Technologies Inc.

UNITED STATES DISTRICT COURT
 DISTRICT OF MASSACHUSETTS

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Luanne Gould,	:	ECF FILING
	:	
Plaintiff,	:	05 CV 11118 (PBS)
	:	
– against –	:	
	:	DEFENDANT’S
Lucent Technologies, Inc.,	:	PRETRIAL DISCLOSURES
	:	<u>PURSUANT TO RULE 26(A)(3)</u>
	:	
Defendant.	:	
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Defendant Lucent Technologies Inc. (“Lucent” or the “Company”), by its attorneys Epstein Becker & Green, P.C., hereby provides the automatic disclosures pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure. In making these disclosures, Lucent states that the disclosures are based on the information reasonably available to it at this time and are made without waiving any objections as to relevance, materiality, or admissibility of evidence in this action or any other action or proceeding.

(a) The name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises:

Lucent expects to present the following witnesses:

1. Pyong W. Deletis

2. Katherine A. Campbell
3. Margaret L. Blumer
4. Brian Ahern
5. Steve Sickel

Lucent reserves the right to supplement this list.

(b) The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony: None.

(c) An appropriate identification of each document or other exhibit, including summaries of other evidence, separate identifying those which the party expects to offer and those which the party may offer if the need arises:

1. Relevant portions of Plaintiff's personnel file maintained by Lucent, including documents Bate stamped DEF 00001-00093.
2. Applications Plaintiff submitted to Lucent in 2003 for family and medical leave, including documents Bate stamped DEF 00029-30, 00034, 00040-42, 00048-50.
3. Lucent's determination letters concerning Plaintiff's eligibility for family and medical leave in 2003, including documents Bate stamped DEF 00035-36, 00038, 00044, 00051.
4. Documents relating to warnings Plaintiff received for her poor attendance record, including documents Bate stamped DEF 00011-12, 00053-54, 00072.
5. Plaintiff's termination letter dated August 1, 2003 Bate stamped DEF 00055.
6. Relevant Company policies and procedures, including Lucent's Absence Control Plan Bate stamped DEF 00094-000135; Lucent's excused work day policy Bate stamped DEF 00138-139, Lucent's Leave of Absence Policy Bate stamped DEF 00155-158.
7. Relevant excerpts from the Collective Bargaining Agreement.

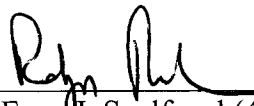
8. July 9, 2003 letter from Greater Hampstead Family Medicine, PC concerning Plaintiff's daughter's chicken pox Bate stamped DEF 00037.
9. September 18, 2003 letter from the Hampstead Village Preschool, Inc. Bate stamped DEF 00050.
10. Other relevant documents produced by Lucent in discovery.

Lucent reserves the right to supplement this list prior to trial.

Dated: New York, New York
September 14, 2006

Respectfully Submitted,

EPSTEIN BECKER & GREEN, P.C.

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